troutman.com



Mandi Moroz

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April 14, 2021

VIA EMAIL

FOIA Officer National FOIA Office U.S. Environmental Protection Agency 1200 Pennsylvania Avenue, NW (2310A) Washington, DC 20460 FOIAonline.gov

Re: Freedom of Information Act Request for Files Related to the Town of Trion

Dear Sir or Madam:

In accordance with the Freedom of Information Act ("FOIA") and Environmental Protection Agency ("EPA") regulations implementing that statute under Title 40 Code of Federal Regulations ("40 CFR"), Part 2, we are requesting files related to the Town of Trion and perand polyfluoroalkyl substances ("PFAS"). Specifically, we are requesting:

- Any submissions to EPA, including sampling results, made pursuant to the terms of the Consent Order between Georgia's Environmental Protection Division ("EPD") and the Town of Trion, Georgia (Enforcement Order No. EPD-WP-8894), as well as any internal EPA analysis or communications related to these submissions.
- Any sampling results from tests conducted by EPA related to the use or presence of PFAS at the Town of Trion or the City of Summerville, Georgia.
- Communications, including any emails, between EPA and the Town of Trion, Georgia related to PFAS, wastewater treatment, or land application of sludge/biosolids.
- Any records discussing or relating to enforcement or inspection activities arising from the use or presence of PFAS at the Town of Trion or the City of Summerville, Georgia.
- Communications, including any emails, between EPA and Georgia EPD regarding the use or presence of PFAS at the Town of Trion or the City of Summerville, Georgia.
- Communications, including any emails, related to the November 12, 2020 decision to lift the health advisory/boil water advisory for the City of Summerville, Georgia.
- Communications, including any emails, discussing the 2018-2019 renewal of the Town of Trion's National Pollutant Discharge Elimination System ("NPDES") permit for its



wastewater treatment plant (Permit No. GA0025607) for the facility located in Trion, Georgia.

- Communications, including any emails, between EPA and Earl H. Parris Jr. or his counsel (the law firm of Davis & Whitlock), including FOIA requests and documents produced in response to those requests, regarding Mount Vernon Mills, Inc. (operating in Trion, Georgia), the Town of Trion, Georgia, or the City of Summerville, Georgia.
- Communications, including any emails, regarding the Notice of Intent (dated November 20, 2020) from Earl H. Parris Jr regarding a proposed lawsuit against Mount Vernon Mills, Inc., the Town of Trion, Georgia, 3M Company, Daikin America, Inc., Huntsman, International, Inc., Pulcra Chemicals, LLC, and Ryan Dejuan Jarrett.
- Any citizen complaints to EPA about any activities of Mount Vernon Mills, Inc. (operating in Trion, Georgia) or the Town of Trion, Georgia.
- Any records, including but not limited to, studies, sampling results, consent orders, or agency guidance regarding increases in PFAS compound levels between influent and effluent flows from a permitted wastewater treatment system.
- Any records consisting of Consent or Adjudicated Orders in which EPA has established a PFAS compound level relative to a water quality standard.

I understand that this FOIA request will be processed within 20 business days, and that if this request requires additional time, I will be contacted and informed if an extension of time is needed. If possible, I would like to receive this information in electronic format and request that it be provided in a piecemeal or rolling manner. I agree to pay fees for this request up to a maximum of \$200.00. If you estimate that fees will exceed this limit, please contact me.

Sincerely,

Wand Mo

Mandi Moroz